

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
ABILENE DIVISION**

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<b>UNITED STATES OF AMERICA</b>	§	
	§	
<b>v.</b>	§	<b>CASE NO. 1:23-CR-00020-H-BU</b>
	§	
<b>TERRELL CHARLES FRYAR</b>	§	

**FIRST MOTION FOR CONTINUANCE OF DETENTION HEARING**

TO THE HONORABLE JUDGE OF SAID COURT:

NOW COMES TERRELL CHARLES FRYAR, Defendant, by and through his Attorney, M. Shaun Galovich, in the above numbered and entitled cause, to make this First Motion for Continuance of Detention Hearing, and as grounds would show the Court the following:

1.

Defendant is set for a Detention hearing on Thursday, June 28, 2023, at 1:30 p.m. Defendant desires to contest his detention pending further hearings. Defendants' attorney was appointed on Thursday, June 22, 2023. After a reasonable period of discussion, Defendant's Attorney has determined the need to withdraw and has filed a separate motion requesting same.

2.

Pursuant to 18 USC § 3142(f), Defendant's Attorney requests this continuance for a reasonable period of time not for purposes of delay but that justice may be done.

WHEREFORE, Defendant prays the detention hearing in the above numbered and entitled cause be continued from its current setting of Thursday, June 29, 2023, and be continued to this Court's next available setting for same.

Respectfully submitted,

**WAGSTAFF LLP**

P.O. Box 360

Abilene, Texas 79604

(325) 677-6291 (Telephone)

(325) 677-6313 (Facsimile)

/s/ M. Shaun Galovich

M. Shaun Galovich

State Bar No. 24059097

[galovich@wagstafflaw.com](mailto:galovich@wagstafflaw.com)

ATTORNEY FOR TERRELL CHARLES  
FRYAR

**CERTIFICATE OF CONFERENCE**

I certify that on June 28, 2023, I conferred with Matt Tusing, the Assistant U.S. Attorney assigned to this matter, regarding the filing of the foregoing and she does not oppose said motion.

/s/ M. Shaun Galovich

M. Shaun Galovich

**CERTIFICATE OF SERVICE**

I, M. Shaun Galovich, certify that on June 28, 2023, a copy of the foregoing was filed through the Electronic Case Filing ("ECF") System. Pursuant to Rule 9 of Miscellaneous Order No. 61, this constitutes service of this document to the United States Attorney for the Northern District of Texas, who is an ECF user.

/s/ M. Shaun Galovich

M. Shaun Galovich